

**FILED**

MAY - 8 2023

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

No.

**23CR283**

v.

Violations: Title 18, United  
States Code, Sections 371 and  
1001(a)(2)

HOJAT ASKARI,

also known as "Grandpa," and

IMAN BAMBOOYANI

**JUDGE PACOLD**

COUNT ONE

MAGISTRATE JUDGE GILBERT

The SPECIAL MAY 2022 GRAND JURY charges:

1. At times material to this indictment:

a. Defendant HOJAT ASKARI was the founder of a medical center ("Company 1") in Prescott, Arizona, and a resident of Prescott, Arizona.

b. Defendant IMAN BAMBOOYANI was a resident of Chicago, Illinois, and an associate of ASKARI.

c. Company 2 was a limited liability company owned and operated by ASKARI and headquartered in Prescott, Arizona.

d. Company 1 and Company 2 maintained bank accounts at JPMorgan Chase Bank ("ASKARI Business Bank Account 1") and Foothills Bank ("ASKARI Business Bank Account 2"). ASKARI was a signatory on both ASKARI Business Bank Accounts.

e. Individual A was a resident of Arizona and an associate of ASKARI and BAMBOOYANI.

f. Jane Doe 1 was a resident of Miami, Florida.

- g. Jane Doe 2 was a resident of Miami, Florida.
- h. Jane Doe 3 was a resident of Chicago, Illinois.
- i. Jane Doe 4 was a resident of Chicago, Illinois.

2. Beginning no later than in or around January 2018, and continuing until on or about May 10, 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

HOJAT ASKARI,  
also known as "Grandpa," and  
IMAN BAMBOOYANI,

defendants herein, together with Individual A and others known and unknown to the grand jury, did knowingly conspire to persuade and entice certain female individuals to travel in interstate commerce for the purpose of engaging in prostitution and in any sexual activity for which a person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2422(a).

**Manner and Means of the Conspiracy**

3. It was part of the conspiracy that, between in or around January 2018 and on or about May 10, 2018, ASKARI and BAMBOOYANI agreed to persuade and entice Jane Doe 1, Jane Doe 2, Jane Doe 3, and Jane Doe 4 (the "female individuals") to travel in interstate commerce for the purpose of engaging in sex acts in exchange for money and other things of value with ASKARI, BAMBOOYANI, Individual A, and others.

4. It was further part of the conspiracy that ASKARI and BAMBOOYANI agreed to provide cash, lodging, and travel reimbursements to the female individuals

to persuade and entice them to travel in interstate commerce for the purpose of engaging in sex acts in exchange for money with ASKARI, BAMBOOYANI, Individual A, and others.

5. It was further part of the conspiracy that ASKARI and BAMBOOYANI persuaded and enticed the female individuals to travel across state lines for the purpose of engaging in sex acts in exchange for money with ASKARI, BAMBOOYANI, Individual A, and others, on or about the following dates and involving the following locations and interstate travel:

a. On or about January 19, 2018, Jane Doe 1 and Jane Doe 2 traveled from Florida to Arizona;

b. On or about January 20, 2018, Jane Doe 3 to traveled from Illinois to Arizona;

c. On or about February 23, 2018, Jane Doe 3 and Jane Doe 4 traveled from Illinois to Florida;

d. On or about March 3, 2018, Jane Doe 3 and Jane Doe 4 traveled from Illinois to Nevada;

e. On or about May 2, 2018, Jane Doe 1 and Jane Doe 2 traveled from Florida to Arizona; and

f. On or about May 6, 2018, Jane Doe 3 and Jane Doe 4 traveled from New York to Arizona.

6. It was further part of the conspiracy that ASKARI wrote checks drawn on his personal bank account and the ASKARI Business Bank Accounts made payable

to BAMBOOYANI and Individual A, which checks BAMBOOYANI and Individual A deposited into bank accounts and withdrew as cash to give to the female individuals as payment for engaging in sex acts on or about the dates and at the locations listed in Paragraph 5 above.

7. It was further part of the conspiracy that ASKARI, BAMBOOYANI, and Individual A paid the female individuals cash for engaging in sex acts on or about the dates and at the locations listed in Paragraph 5 above.

8. It was further part of the conspiracy that ASKARI paid for lodging for the female individuals as payment for engaging in sex acts on or about the dates and at the locations listed in Paragraph 5 above.

9. It was further part of the conspiracy that ASKARI, BAMBOOYANI, Individual A, and others misrepresented, concealed and hid, and caused to be misrepresented, concealed and hidden, and attempted to misrepresent, conceal and hide acts done in furtherance of the conspiracy and the purpose of those acts.

#### Overt Acts

10. It was further part of the conspiracy that ASKARI, BAMBOOYANI, and Individual A committed and caused to be committed one or more overt acts, within the Northern District of Illinois and elsewhere, in furtherance of and to effect the objects of the conspiracy, including, but not limited to the following:

a. On or about January 19, 2018, Jane Doe 1 and Jane Doe 2 flew from Fort Lauderdale, Florida to Phoenix, Arizona.



b. On or about January 20, 2018, Jane Doe 3 flew from Chicago, Illinois to Phoenix, Arizona.

c. On or about January 22, 2018, ASKARI wrote a check from his personal bank account to BAMBOOYANI in the amount of \$6,000.

d. On or about January 22, 2018, BAMBOOYANI deposited a check in the approximate amount of \$6,000 from ASKARI to his personal bank account.

e. On or about January 24, 2018, BAMBOOYANI withdrew \$2,000 in cash from his personal bank account.

f. On or about January 24, 2018, BAMBOOYANI paid Jane Doe 3 approximately \$2,000 in cash.

g. On or about January 26, 2018, BAMBOOYANI withdrew approximately \$4,000 in cash from his personal bank account.

h. On or about January 26, 2018, BAMBOOYANI paid Jane Doe 3 approximately \$4,000 in cash.

i. On or about February 23, 2018, BAMBOOYANI, Jane Doe 3 and Jane Doe 4 flew from Chicago, Illinois to Orlando, Florida.

j. On or about February 24, 2018, BAMBOOYANI withdrew approximately \$6,000 in cash from his personal bank account.

k. On or about February 24, 2018, BAMBOOYANI paid Jane Doe 3 and Jane Doe 4 approximately \$6,000 in cash.

l. On or about February 26, 2018, ASKARI wrote a check from his personal bank account to BAMBOOYANI in the approximate amount of \$6,000.

m. On or about February 26, 2018, BAMBOOYANI deposited a check in the approximate amount of \$6,000 from ASKARI into his personal bank account.

n. On or about March 3, 2018, BAMBOOYANI, Jane Doe 3, and Jane Doe 4 flew from Chicago, Illinois to Las Vegas, Nevada.

o. On or about March 14, 2018, ASKARI wrote a check for approximately \$3,000 to BAMBOOYANI from his personal bank account.

p. On or about March 14, 2018, BAMBOOYANI deposited a check in the approximate amount of \$3,000 from ASKARI into his personal bank account.

q. On or about May 2, 2018, Jane Doe 1 and Jane Doe 2 flew from Miami, Florida to Phoenix, Arizona.

r. On or about May 6, 2018, Jane Doe 3 and Jane Doe 4 flew from New York City, New York to Phoenix, Arizona.

s. On or about May 6, 2018, ASKARI wrote a check to BAMBOOYANI in the approximate amount of \$3,000 from ASKARI Business Bank Account 1.

t. On or about May 7, 2018, ASKARI wrote a check to Individual A in the approximate amount of \$4,000 from Askari Business Bank Account 2.

u. On or about May 7, 2018, Individual A cashed a check, drawn on Askari Business Bank Account 2 in the approximate amount of \$4,000, at a bank in Arizona.

v. On or about May 7, 2018, Individual A paid Jane Doe 3 and Jane Doe 4 approximately \$4,000 in cash.

w. On or about May 9, 2018, BAMBOOYANI deposited a check, drawn on ASKARI Business Bank Account 1 in the amount of \$3,000, into his personal bank account.

x. On or about May 10, 2018, BAMBOOYANI withdrew \$3,000 in cash from his personal bank account.

y. On or about May 10, 2018, BAMBOOYANI paid Jane Doe 3 and Jane Doe 4 approximately \$3,000 in cash.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

The SPECIAL MAY 2022 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of the indictment are incorporated here.

2. The Federal Bureau of Investigation (the “FBI”) and the Internal Revenue Service (the “IRS”) had initiated an investigation of ASKARI regarding potential violations of federal law. This investigation, together with a companion grand jury investigation, were initiated and remained pending in the Northern District of Illinois, Eastern Division, prior to November 17, 2022.

3. On or about November 17, 2022, ASKARI was interviewed by federal law enforcement in Prescott, Arizona.

4. The following matters, among others, were material to the investigation: (i) the scope and nature of ASKARI’s relationships with Bambooyani, Jane Doe 3, and Jane Doe 4; and (ii) the purpose of ASKARI’s payments to Bambooyani, including payments of approximately \$6,000 on or about February 26, 2018, approximately \$3,000 on or about March 14, 2018, and approximately \$3,000 on or about May 6, 2018.

5. On or about November 17, 2022, at Prescott, Arizona,

HOJAT ASKARI,  
also known as “Grandpa,”

defendant herein, did knowingly and willfully make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the



FBI and the IRS, each an agency within the executive branch of the government of the United States, when he stated in substance the following:

a. When shown a photograph of Jane Doe 3, and asked if he had met Jane Doe 3, ASKARI replied, "No";

b. When asked if he had ever met a woman with the same first name as Jane Doe 3, ASKARI replied, "No, I haven't";

c. When shown a photograph of Jane Doe 4, and asked if he had met Jane Doe 4, ASKARI replied, "I don't know her";

d. When asked if he had ever met a woman with the same first name as Jane Doe 4, ASKARI replied, "No";

e. ASKARI denied having sex with any of the women introduced to him by Bambooyani;

f. ASKARI stated that a \$6,000 payment he made to Bambooyani in February 2018 was a reimbursement related to a business partnership;

g. ASKARI stated that the \$3,000 payments that he made to Bambooyani in March 2018 and May 2018 were either for the benefit of Bambooyani's family member, or a reimbursed business expense; and

h. When asked if any of the checks ASKARI wrote to Bambooyani were related to prostitution, ASKARI replied, "No."

In violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL:

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FOREPERSON

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Signed by AMARJEET S. BHACHU on behalf of the  
ACTING UNITED STATES ATTORNEY